HEALTH AFFAIRS

Privacy/Security Officer Transition Report

HIPAA Training: 2005 Summer Sessions

TMA Privacy Office

Training Objectives

- Upon completion of this course, you should be able to:

    - Explain the timeline for transition reporting

    - Explain the Transition Plan

    - Describe the requirements for the outgoing Privacy/Security Officer for reporting to the Commander

    - Describe the Roadmap for Success for the new Privacy/Security Officer

Agenda

- Privacy/Security Officer Transition Timeline
- Privacy/Security Officer Common Transition Requirements
- Privacy/Security Officer Specific Transition Requirements
- Incoming Roadmap For Success

Privacy/Security Officer Transition Timeline

Transition Timeline

- To ensure continuity of compliance with the HIPAA Privacy and Security standards, the TRICARE Management Activity (TMA) has developed metrics to measure and document the MHS compliance

- The elements of this reporting responsibility are being proposed and will be tested and adjusted before final recommendation for implementation.

Privacy/Security Officer Common Transition Requirements
Transition Timeline

- Proposed reporting timeline and frequency:
    - 90 days out, brief commander of change and plan for transition
    - 60 days out, appoint new/interim Privacy/Security Officer in writing
    - 30 day transition plan to primary replacement or interim/alternate

Privacy and Security Officer Common Transition Requirements

Documentation Review

- Status of MTF HIPAA policies and procedures completion
- Program overview
- Service specific compliance checklists
- Inspector General (IG) reports
- Joint Commission on the Accreditation of Healthcare Organizations (JCAHO) reports
- HIPAA assist visit reports
- Business Associate Agreements
- Memoranda of Agreement (MOA)/Memoranda of Understanding (MOU)

Privacy and Security Officer Common Transition Requirements
Job Positions within the LMS

- Job Position
  - Number of personnel assigned in each job category at the MTF level

**Example only – Not generated by LMS

Senior Executive Staff	10
Provider	25
Ancillary Clinic	50
Nursing	50
Business/Finance	10
Administrative Support	10
Information Management / Technology	10
Medical Records / Patient Admin	20
Facility Support Services	25
Volunteers*	25

Tool Users – To Ensure Continuity

- HIPAA BASICS^{TM}
  - Subscriber administrator
  - Lead users
  - Regular users
- PHIMT
  - User administrators
  - Privacy specialists
  - Regular users
- LMS
  - Subscriber administrators
- OCTAVE^{SM}
- MISRT team members

Security Specific Documentation

- Turnover report
  - Contingency Of Operations Plan (COOP)
  - Status of Security Mitigation Plan
  - Medical Information Systems Readiness Team (MISRT) Documents

Incoming Roadmap for Success

Getting Started

- Meet with the MTF Commander
- Meet with the outgoing Privacy/Security Officer
- Conduct a "walk through" of your facility
  - Review all transition reports and documentation
  - Review existing policies and procedures for gaps in coverage
  - Revise as needed
- Meet with users of the tools
- Contact your Service Representative
- Contractor support point of contact, if applicable
  - Know who they are and what they can do for you
  - Utilize contractor support as appropriate

Incoming Roadmap for Success
Getting Started (continued)

- Take all required HIPAA training on the LMS

- Take training related to the HIPAA Suite of Tools

- Based on Service policies and procedures, request tool Administrator accounts

Privacy Officer Appointment Letter

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
HEALTH AFFAIRS
SKYLINE FIVE, SUITE 810, 5111 LEESBURG PIKE
FALLS CHURCH, VIRGINIA 22041-3206

TRICARE
MANAGEMENT
ACTIVITY

JUN 1 8 2002

MEMORANDUM FOR DEPUTY SURGEON GENERAL OF THE ARMY
DEPUTY SURGEON GENERAL OF THE NAVY
DEPUTY SURGEON GENERAL OF THE AIR FORCE

SUBJECT: Request To Appoint Military Treatment Facility/Dental Treatment Facility Health
Insurance Portability and Accountability Act Privacy Officer

The purpose of this letter is to request that a Privacy Officer (PO) be appointed at each
Military Treatment Facility (MTF) and Dental Treatment Facility (DTF) in the Military Health
System.

The Health Insurance Portability and Accountability Act (HIPAA), Public Law 104-191,
was enacted August 21, 1996. The purpose of the Act is to improve the portability and
continuity of health insurance coverage, improve access to long term care services and coverage,
and to simplify the administration of healthcare. A primary component of HIPAA administrative
simplification provisions is the protection and privacy of individually identifiable health
information. The HIPAA Privacy rule was signed in December 2000. Although a modification
to the final rule has been proposed which will amend it, full compliance with the requirements of
the HIPAA Privacy rule must still be met by April 14, 2003. The Department of Defense (DoD)
HIPAA Privacy regulation, which will be completed after the modification to the final rule is
completed, will describe how the Military Health System (MHS) will implement the rule.

To meet the requirements of the HIPAA Privacy rule and the DoD HIPAA Privacy
regulation, a PO must be appointed at each covered entity, i.e., medical and dental facility.
(Based on the size and complexity of the MTF/DTF, latitude is given to allow a PO to be
responsible for more than one facility in a geographic area when smaller facilities can share
resources under a mutually acceptable agreement.) The PO will be the MTF/DTF point of
contact for HIPAA Privacy implementation and receive training and guidance from the
respective Service HIPAA Program Office . Suggested roles and responsibilities are described in
the attachment to this memorandum. It is imperative that the person selected as the MTF/DTF
Privacy Officer have the requisite experience, knowledge and authority to develop, implement
and monitor the privacy practices, policies and procedures throughout the facility.

15

The Appointment Letter and Contact Information

- New Appointment Letter prepared to include:
  - Appointment as member of the HIPAA Committee
- Appoint an alternate Privacy/Security Officer
- Post contact information throughout MTF on how to reach new Privacy/Security Officer

Committee Charter

The HIPAA Committee

- The HIPAA Committee was formed after the closeout of the Military Treatment Facility (MTF) HIPAA working group. After the 14 April 2003 Privacy compliance date, and the 21 April 2005 Security compliance date it was deemed necessary to have a forum meet on a regular basis. The goals and objectives of this forum are to address ongoing issues. Additionally the forum addresses new issues and assists in solving new issues as they relate to the HIPAA Program at the MTF. Membership to this forum can include; The MTF Privacy Officer, Security Officer, Information Manager, a Clinician, a Medical Records Representative, MISRT and Support Contractors

Resources

- Review all periodic reports
- HIPAA Committee membership
  - Review membership and charter
  - Review past meeting minutes
  - Review outstanding action items
- WebEx sessions
- E-news
- TMA Privacy Office website
  - Users guides for the LMS, PHIMT, and HIPAA Basics^{TM} are available on the TMA website
- Professional Organizations

WebEx Schedule Example

	Topic	Type	❓	✅	❌	Starting Time
☐	PHIMT Complaint Training	Training	N/A	N/A	N/A	June 1, 2005 6:00 pm
☐	PHIMT Complaint Training	Training	N/A	N/A	N/A	June 2, 2005 9:00 am
☐	USUHS HIPAA Compliance Brief	Training	N/A	N/A	N/A	June 2, 2005 1:00 pm
☐	HIPAA BASICS Update	Training	N/A	N/A	N/A	June 22, 2005 1:00 pm
☐	HIPAA BASICS Update	Training	N/A	N/A	N/A	June 23, 2005 9:00 am
☐	HIPAA BASICS Update	Training	N/A	N/A	N/A	June 28, 2005 6:00 pm

Scheduled   Invited   Set Up One-Click

19

WebEx Announcement - Example

Topic: **HIPAA BASICS Update**
Date: **Wednesday, June 22, 2005**
Time: **1:00 pm, Eastern Daylight Time**
Session Number: xxx 982 674
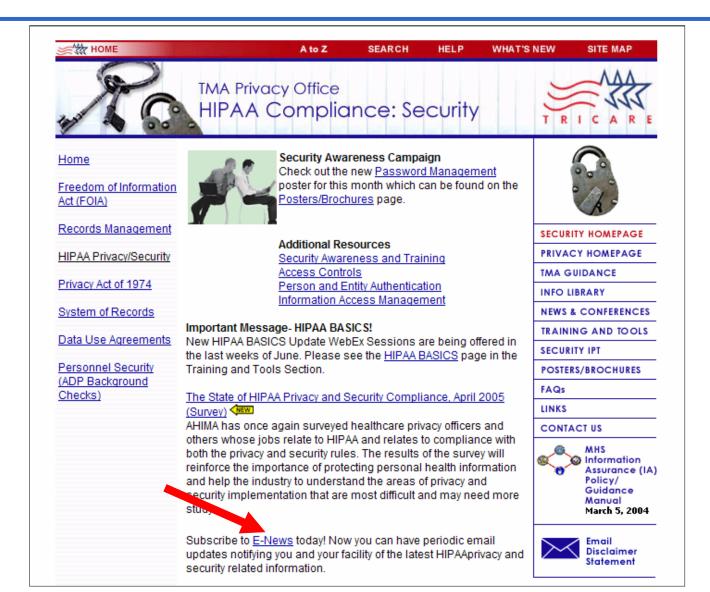Training session password: This session does not require a password.
Teleconference: Call 1-866-269-0000 (Toll free in US/Canada) or 1-408-678-2010 (US/Canada Direct)

Please click the following link to see more information about the training session, including its agenda, or to join the session.
https://bah.webex.com/bah/k2/j.php?ED=85410017&UID=xxx63682

E-News Subscription

Common Reporting Requirements
E-News Example

- **TMA Privacy Office E-News**
- April 8, 2005
- **Privacy and Security Training**
- We have recently received inquiries asking if the online Quick Compliance Security and Privacy courses can be printed. Due to copyright restrictions, copying the Quick Compliance Privacy and Security courses is not permissible. As an alternative, we suggest that you project the online courses for your students in a classroom setting.
- **WebEx - LMS Update Sessions**
- Beginning April 11th, we will be holding WebEx training sessions on the Learning Management System (LMS). The LMS Update Session slides have just been posted to the website under April Training Materials. The training will focus on updated capabilities of the system, including new custom fields and enhanced reporting functions. It is very important that all training administrators attend these sessions. Please see instructions to access the sessions along with the schedule. Login information will be distributed in separate correspondence through the Service Representatives.
- **Disclaimer**
- *The appearance of links from this website is intended to enhance its informational capability but does not constitute endorsement by TRICARE Management Activity. TRICARE does not exercise any control over the information or services provided by those websites. Further reproduction or redistribution for private use or gain is subject to original copyright restrictions.*

Professional Organizations

- Join Professional Organizations as appropriate:
  - AHIMA
    - American Health Information Management Association
  - IAPP
    - International Association of Privacy Professionals
  - HCCA
    - Health Care Compliance Association
  - Others
    - American College of Healthcare Executives (ACHE)
    - Healthcare Information and Management Systems Society (HIMSS)